



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

October 15, 2008

Philip Giudice, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Comments – Class II Regulations – Union of Concerned Scientists

Commissioner Giudice:

Thank you for the opportunity to comment on the Massachusetts Department of Energy Resources's rule-making for the RPS Class II provisions of the Green Communities Act. The Union of Concerned Scientists is the leading science-based non-profit working for a healthy environment and a safer world. UCS's Clean Energy Program focuses on encouraging the development of clean and renewable energy resources and on improving energy efficiency. Participating in the design and implementation of state renewable energy policies is one way UCS actively works toward these ends and promotes the public interest, which is served by a reliable and efficient regional electricity market.

With regard to setting an appropriate level for the Massachusetts RPS Class II requirement:

Existing renewable energy facilities can help moderate electricity rates, provide diversity in our electricity supply, and displace or obviate the need for more polluting energy sources. The new RPS Class II should provide support, in the setting of the target and the ACP level, to keep important existing renewable energy facilities online.

The RPS Class II should not, however, provide support beyond what is needed for existing renewable energy facilities or beyond the benefits those facilities bring to ratepayers. Given that the Class II is limited to pre-RPS resources, setting a target that increases over time—as a fixed percentage requirement would do if electricity consumption covered by the RPS increased—would mandate additional demand for a fixed supply, providing support beyond what DOER had determined initially necessary and unnecessarily driving up costs of compliance. The target, both initially and over the long term, should reflect the pool of expected existing renewable energy resources and the expected levels of electricity consumption.

Thank you for your attention.

Sincerely,

John H. Rogers
Northeast Clean Energy Project Manager
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